

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY  
AVERAGE WHOLESAL PRICE  
LITIGATION

MDL 1456

Master File No. 01-CV-12257-PBS  
Subcategory Case No. 06-CV-11337-PBS

THIS DOCUMENT RELATES TO:  
*United States of America ex rel. Ven-A-Care  
of the Florida Keys, Inc. v. Boehringer  
Ingelheim Corporation, et al.*, Civil Action  
No. 07-10248-PBS

Judge Patti B. Saris

Magistrate Judge Marianne B. Bowler

**ASSENTED TO MOTION FOR ADMISSION PRO HAC VICE**

Defendants Boehringer Ingelheim Corporation; Boehringer Ingelheim Pharmaceuticals, Inc.; Roxane Laboratories, Inc.; and Roxane Laboratories, Inc. n/k/a Boehringer Ingelheim Roxane, Inc., by and through Donoghue, Barrett & Singal, P.C., hereby request that Martin L. Roth, Esq. be admitted *pro hac vice* in the above-referenced action. In support of this motion, undersigned counsel respectfully states as follows:

1. Martin L. Roth, Esq. is an attorney, who maintains an office for the practice of law at Kirkland & Ellis, LLP, 300 North LaSalle Street, Chicago, Illinois 60654.

2. Pursuant to Local Rule 83.5.3(b), I have attached, as Exhibit A, an affidavit signed by Attorney Roth, which indicates that Attorney Roth is in full compliance with requirements of that local rule for admission *pro hac vice*.

3. The undersigned counsel requests that this court allow the motion so that Attorney Roth may file pleadings and appear and be heard at all proceedings in this case on behalf of the above-listed Defendants.

4. The undersigned counsel will appear as local counsel for Defendants Boehringer Ingelheim Corporation; Boehringer Ingelheim Pharmaceuticals, Inc.; Roxane Laboratories, Inc.; and Roxane Laboratories, Inc. n/k/a Boehringer Ingelheim Roxane, Inc.

5. Counsel for the United States has assented to the motion.

WHEREFORE, undersigned counsel respectfully requests that the court enter an order permitting Martin L. Roth to appear *pro hac vice* in this matter.

**LOCAL RULE 7.1 CERTIFICATION**

I, Richard Goldstein, Esq., hereby certify that I understand from Attorney Roth that counsel for the plaintiffs have assented to this motion.

Respectfully Submitted,

/s/ Richard Goldstein  
Richard Goldstein, BBO #565482  
DONOGHUE, BARRETT & SINGAL, P.C.  
One Beacon Street, Suite 1320  
Boston, Massachusetts 02108  
(617) 720-5090

Dated: September 25, 2009

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on September 25 2009, a copy to LexisNexis File and Serve for posting and notification to all parties.

By: /s/ Richard Goldstein  
Richard Goldstein